

Composite Exhibit 1

RANDAZZA
LEGAL GROUP

Jay Marshall Wolman, JD
Licensed in CT, MA, NY, DC

2 December 2024

Via E-Mail Only

Seldon Jeffrey Childers, Esq.
Nicholas Whitney, Esq.
Childers Law, LLC
2135 NW 40th Terr., Ste. B
Gainesville, FL 32605
jchilders@smartbizlaw.com
nwhitney@smartbizlaw.com

***Re: Project Veritas, et al. v. James O'Keefe, et al., No. 7:23-cv-04533
Confidential Designation - Skakel***

Dear Counsel,

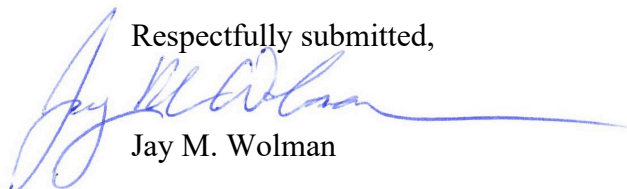
Pursuant to Section 2 of the Confidentiality Stipulation and Protective Order (ECF No. 99) in the above-referenced matter, Plaintiffs hereby designated certain attached documents previously produced by non-party George Skakel in response to Defendants' subpoena as CONFIDENTIAL and HIGHLY CONFIDENTIAL—ATTORNEYS' OR EXPERT' EYES ONLY under the protective order. Kindly ensure that your copy of the documents, which had not been marked, are properly handled as required.

For ease of reference, as Mr. Skakel did not Bates stamp his production, we have taken the liberty of Bates number stamping the Confidential materials as well, and, in the interests of completeness, we have numbered his non-confidential production as well.

In the course of his production, Mr. Skakel produced 107 documents that are attorney-client privileged/work product privileged where the privilege belongs to one or both Plaintiffs. Per Fed. R. Civ. P. 26, we are providing the accompanying privilege log. Such documents should be deemed inadvertently produced—Mr. Skakel possessed them as a former board member for one or both Plaintiffs and Plaintiffs lacked the ability to screen and log them prior to production by him. Please dispose of them as required.

Thank you for your attention to this matter.

Respectfully submitted,



Jay M. Wolman

Encl. SKAKEL_000001 – SKAKEL_029056

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
PROJECT VERITAS and PROJECT :
VERITAS ACTION FUND, : Civil Action No. 7:23-cv-04533
:
Plaintiffs, :
:
-against- :
:
JAMES O'KEEFE, TRANSPARENCY 1, :
LLC d/b/a O'KEEFE MEDIA GROUP, :
ANTHONY IATROPOULOS, and RC :
MAXWELL, :
:
Defendants. :
-----X

PRIVILEGE LOG FOR PRODUCTION BY NON-PARTY GEORGE SKAKEL

In furtherance of Non-Party George Skakel's responses to a Subpoena served on him by Defendants James O'Keefe and Transparency 1, LLC, Plaintiffs hereby provide a privilege log of all documents produced by Mr. Skakel that are attorney-client privileged and/or work product privileged, where such privilege belongs to one or both Plaintiffs, attached hereto as **Exhibit 1.**

Dated: December 2, 2024.

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, CT 06103
Tel: (888) 887-1776
Email: jmw@randazza.com

Civil Action No. 7:23-cv-04533

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 2, 2024, the foregoing document was served on all parties or their counsel of record via electronic mail.

Respectfully Submitted,

/s/ Jay M. Wolman
Jay M. Wolman (JW0600)

Custodian/Person	Upload Name	Document Type	Sort Date	Document ID	File Author	File Title	File Subject	File Path	File Name	File Extension	Email From	Email To	Email CC	Email BCC	Email Subject	Email Sent Date	Email Sent Time	Tag: Privilege
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George Skakel	20241119 Sk. eDoc		2/15/2018	2/15/2018	JFO Technology			\20241119 SI 2-15-18 Year. docx		.docx								TRUE
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George Skakel	20241119 Sk. Attachment		3/31/2020	3/31/2020	John Sullivan			\20241119 SI Pending Litig. pdf		.pdf								TRUE
George Skakel	20241119 Sk. eDoc		3/8/2023	3/8/2023	Mark Smith	Employment 00042400 v.1		\20241119 SI 3-5-18 James. doc		.doc								TRUE
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George Skakel	20241119 Sk. Attachment		4/10/2019	4/10/2019	Russell Verney			\20241119 SI Summary of I. docx		.docx								TRUE
George Skakel	20241119 Sk. Attachment		4/1/2021	3/31/2021	John Sullivan			\20241119 SI 2021-04-01 P. docx		.docx								TRUE
George Skakel	20241119 Sk. eDoc		4/16/2019	4/16/2019	Jessica Hanbury			\20241119 SI 4-16-2019 JO. docx		.docx								TRUE
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George Skakel	20241119 Sk. eMail		7/1/2022	7/1/2022	John Sullivan	Legal Training Keynote		\20241119 SI 7-1-22 Legal. msg		.msg					Legal Training	7/1/2022	2:10:20 PM	TRUE
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George Skakel	20241119 Sk. eMail	4/7/2023	4/7/2023	RE: Audit report today	forsythe.bett	mtyrmand@gmail.com	tomo@projectv	RE: Audit rep	4/7/2023	2:59:50 PM	TRUE	
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George Skakel	20241119 Sk. eMail	6/29/2023	6/29/2023	Microsoft Office User							TRUE	
George Skakel	20241119 Sk. eDoc	3/14/2023	3/14/2023	FW: James' contract	John Sullivan	George Skakel	Stefan Passantino	FW: James' c	3/14/2023	6:05:18 PM	TRUE	
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George Skakel	20241119 Sk. eMail	4/17/2023	4/17/2023	PRIVILEGED	hull.caitlin@	tomo@proj	forsythe.bett@DDORSEY.co	PRIVILEGED	4/17/2023	4:51:29 PM	TRUE	
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George Skakel	20241119 Sk. eDoc	3/3/2023	3/3/2023	George Skakel							TRUE	
George Skakel	20241119 Sk. eMail	3/3/2023	3/3/2023	Re: Westchester County D \20241119 SJ 3-4-23 large f. docx	Stefan Passar	joebarton	Ju Matt Tyrmand	Steven Aler	Re: Westche	3/3/2023	12:45:31 PM	TRUE
George Skakel	20241119 Sk. eMail	3/3/2023	3/3/2023	RE: Full copy	George Skakel	betts.gina@	DANIEL R. STRACK	(dan@p	RE: Full copy	3/3/2023	9:17:08 AM	TRUE
George Skakel	20241119 Sk. Attachment	3/3/2023	3/3/2023		Zach Kramer	John Sullivan	Matt Tyrmand	Steven Aler	Re: Westche	3/3/2023	12:39:21 PM	TRUE
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George Skakel	20241119 Sk. Attachment	6/4/2019	6/4/2019	Re: Request for approval o \20241119 SJ Package.000K. msg	Matthew Tyr	Steve Robert	James E. O'Keefe III	Asha B	Re: Request f	6/4/2019	2:31:38 PM	TRUE
George Skakel	20241119 Sk. eDoc	6/4/2019	6/4/2019	Re: Request for approval o \20241119 SJ Package.000K. msg	George Skakel	Matthew Ty	James E. O'Keefe III	Asha B	Re: Request f	6/4/2019	3:00:05 PM	TRUE
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George Skakel	20241119 Sk. Attachment	2/12/2018	11/19/2017	Microsoft Word - 2016-201	Tom O'Hara	George Skakel	Elizabeth Prendergast	Noli	FW: Georgi	5/16/2023	3:33:51 PM	TRUE
George Skakel	20241119 Sk. Attachment	2/12/2018	12/14/2016	eburroughs Russell Verney							TRUE	
George Skakel	20241119 Sk. eMail	5/16/2023	5/16/2023	FW: Georgia - due June 1							TRUE	
George Skakel	20241119 Sk. Attachment	5/16/2023	5/15/2023	Nolan-Horvey, Amy D (72380)							TRUE	
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George Skakel	20241119 Sk. Attachment	5/16/2023	5/15/2023	Nolan-Horvey, Amy D (72380)							TRUE	
George Skakel	20241119 Sk. eMail	3/12/2018	3/12/2018	RE: Revised Employment A	Steve Robert	George Skakel	Steve Roberts	RE: Revised E	3/12/2018	2:45:42 PM	TRUE	
George Skakel	20241119 Sk. Attachment	3/12/2018	3/12/2018	Mark Smith							TRUE	

RANDAZZA

LEGAL GROUP

Jay Marshall Wolman, JD
Licensed in CT, MA, NY, DC

2 December 2024

Via E-Mail Only

Seldon Jeffrey Childers, Esq.
Nicholas Whitney, Esq.
Childers Law, LLC
2135 NW 40th Terr., Ste. B
Gainesville, FL 32605
jchilders@smartbizlaw.com
nwhitney@smartbizlaw.com

Re: *Project Veritas, et al. v. James O’Keefe, et al., No. 7:23-cv-04533*
Confidential Designation - Strack

Dear Counsel,

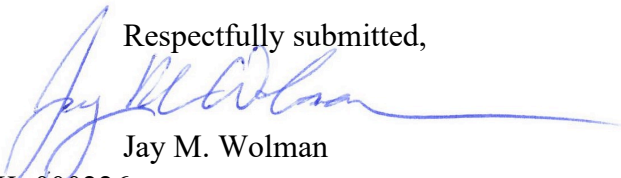
Pursuant to Section 2 of the Confidentiality Stipulation and Protective Order (ECF No. 99) in the above-referenced matter, Plaintiffs hereby designated certain attached documents previously produced by non-party Daniel Strack in response to Defendants’ subpoena as CONFIDENTIAL under the protective order. Kindly ensure that your copy of the documents, which had not been marked, are properly handled as required.

For ease of reference, as Mr. Strack did not Bates stamp his production, we have taken the liberty of Bates number stamping the Confidential materials as well, and, in the interests of completeness, we have numbered his non-confidential production as well.

Additionally, Mr. Strack produced a document that is attorney-client privileged/constitutes attorney work-product where such privilege belongs to Plaintiff Project Veritas. Per Fed. R. Civ. P. 26, we are logging it as a September 21, 2022, 10:52 AM e-mail from John Sullivan to Jered Ede, James O’Keefe, Dan Strack, Jen Kiyak, Zach Kram, and Julia Witt with the subject line “RE: Gioia, et al. v. Project Veritas, Case No. 22-cv-06710; Pre-Motion Letter”. Such documents should be deemed inadvertently produced—Mr. Strack possessed them as a former employee, and Plaintiffs lacked the ability to screen and log it prior to production by him. Please segregate that document from your files.

Thank you for your attention to this matter.

Respectfully submitted,



Jay M. Wolman

Encl. STRACK_000001-STRACK_000226

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
PROJECT VERITAS and PROJECT :
VERITAS ACTION FUND, : Civil Action No. 7:23-cv-04533
:
Plaintiffs, :
:
-against- :
:
JAMES O'KEEFE, TRANSPARENCY 1, :
LLC d/b/a O'KEEFE MEDIA GROUP, :
ANTHONY IATROPOULOS, and RC :
MAXWELL, :
:
Defendants. :
-----X

PRIVILEGE LOG FOR PRODUCTION BY NON-PARTY DANIEL STRACK

In furtherance of Non-Party Daniel Strack's responses to a Subpoena served on him by Defendants James O'Keefe and Transparency 1, LLC, Plaintiffs hereby provide a privilege log of all documents produced by Mr. Strack that are attorney-client privileged and/or work product privileged, where such privilege belongs to one or both Plaintiffs, attached hereto as **Exhibit 1.**

Dated: December 2, 2024.

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, CT 06103
Tel: (888) 887-1776
Email: jmw@randazza.com

Civil Action No. 7:23-cv-04533

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 2, 2024, the foregoing document was served on all parties or their counsel of record via electronic mail.

Respectfully Submitted,

/s/ Jay M. Wolman
Jay M. Wolman (JW0600)

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